

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:

Case No. 15-34864

Chandra Medlin

Chapter 13

Debtor(s).

Hon. Judge A. Benjamin Goldgar

OBJECTION TO MOTION TO MODIFY CHAPTER 13 PLAN FILED MAY 21, 2021

NOW COMES U.S. Bank Trust National Association, as Trustee of Chalet Series III Trust, and/ or its assigns (hereinafter “Creditor”), by and through its attorneys, Sottile & Barile LLC, and moves this Honorable Court for an Order denying Motion to Modify Chapter 13 Plan and in support thereof states as follows:

1. Debtor filed a petition under Chapter 13 of Title 11, United States Bankruptcy Code on October 13, 2015 and this Court has jurisdiction pursuant to 28 U.S.C. §1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois.
2. Creditor holds a secured interest in the Real Estate located at 4460 Longmeadow Drive, Gurnee, IL 60031.
3. Creditor filed its proof of claim 1-1 on December 23, 2015, indicating a pre-petition arrearage amount of \$84,165.03. The amount of \$11,880.77 is still owed toward that pre-petition arrearage. The Debtor cites to §1329d(1)(A), and simply indicates that she has been adversely impacted by the ongoing COVID-19 pandemic, yet provides no evidence to support that statement.

WHEREFORE, Creditor prays this Court deny the Motion to Modify Chapter 13 Plan, and for such other and further relief as this Court may deem just and proper.

Dated: June 23, 2021

Respectfully Submitted,

/s/ Jon J. Lieberman

Jon J. Lieberman (OH 0058394)
Sottile & Barile, Attorneys at Law
394 Wards Corner Road, Suite 180
Loveland, OH 45140
Phone: 513.444.4100
Email: bankruptcy@sottileandbarile.com
Attorney for Creditor

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:	Case No. 15-34864
Chandra Medlin	Chapter 13
Debtor(s).	Hon. Judge A. Benjamin Goldgar

NOTICE OF FILING

TO: Glenn B Stearns, Trustee, mcguckin_m@lisle13.com by electronic notice through ECF

Mohammed O Badwan, Counsel for Debtor, mbadwan@sulaimanlaw.com by electronic notice through ECF

Jennifer A Filipiak, Counsel for Debtor, jmclaughlin@sulaimanlaw.com by electronic notice through ECF

Chandra Medlin, Debtor, 4460 Longmeadow Drive, Gurnee, IL 60031

PLEASE TAKE NOTICE that on June 23, 2021, counsel has electronically sent for filing with the Clerk of the U.S. Bankruptcy Court, an Objection, a copy of which is hereto attached.

CERTIFICATION

I hereby certify that I served a copy of Notice to the above, as to the Trustee and Counsel for the Debtor(s) via electronic notice on June 23, 2021 and as to the Debtor(s) by causing same to be mailed in a properly addressed envelope, postage prepaid, from 394 Wards Corner Road, Suite 180, Loveland, Ohio 45140 before the hour of 5:00 PM on June 23, 2021.

Dated: June 23, 2021

Respectfully Submitted,

/s/ Jon J. Lieberman

Jon J. Lieberman (OH 0058394)
Sottile & Barile, Attorneys at Law
394 Wards Corner Road, Suite 180
Loveland, OH 45140
Phone: 513.444.4100
Email: bankruptcy@sottileandbarile.com
Attorney for Creditor